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DIGEST OF OTHER RECENT VIRGINIA DECISIONS.

Supreme Court of Appeals.

Note.—In this department we give the syllabus of every case decided by the Virginia Supreme Court of Appeals, except of such cases as are reported in full.

FLIPPO *v.* COMMONWEALTH.

Jan. 24, 1918.

[94 S. E. 771.]

1. **Infants (§ 20*)—Cruel Treatment of Child—Evidence.**—Evidence held insufficient, though considered on demurrer, to sustain verdict that defendant was guilty of overworking and cruelly treating a child 13 years old under his control.

[Ed. Note.—For other cases, see 7 Va.-W. Va. Enc. Dig. 466.]

2. **Criminal Law (§ 516*)—Evidence—Statements as Confessions.**—In a prosecution for cruelly treating and overworking a child of 13 years in defendant's control, statements by the boy as to his treatment, repeated by a state's witness to defendant, who either denied or explained them, were not confessions.

[Ed. Note.—For other cases, see 3 Va.-W. Va. Enc. Dig. 95.]

3. **Reformatories (§ 7*)—Custody of Child from Children's Home Society—Duty of Correction.**—Where the superintendent of the Children's Home Society placed an incorrigible boy with defendant, the boy was rightfully put to work on defendant's farm, and, if his conduct was such as to require reasonable and moderate correction for his welfare, it was the right and duty of defendant to administer it.

[Ed. Note.—For other cases, see 11 Va.-W. Va. Enc. Dig. 760.]

Error to Circuit Court, Henrico County.

W. F. Flippo was convicted of an offense, and he brings error. Reversed.

Geo. P. Haw, of Richmond, for plaintiff in error.

The Attorney General, for the Commonwealth.

WEBB *v.* COMMONWEALTH.

Jan. 24, 1918.

[94 S. E. 773.]

1. **Indictment and Information (§ 32 (3)*)—Concluding Clause.**—Indictment is not invalid because, to the concluding clause, provided

*For other cases, see same topic and KEY-NUMBER in all Key-Numbered Digests and Indexes.